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MAR 11 2008

**UTAH DIVISION OF
SOLID & HAZARDOUS WASTE**

08.00990



**U.S. ARMY DUGWAY PROVING GROUND
DIRECTORATE OF ENVIRONMENTAL PROGRAMS**

**Dugway Resource Conservation and Recovery Act
(RCRA) Permit #UT3750211259
Issued: September 2005**

**RCRA PERMIT
MODIFICATION**

March 2008

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**Dugway Proving Ground RCRA Operating Permit
Summary of Modifications, March 2008**

Summary of Proposed of Modifications to Module VII Attachments

Two modifications to the Module VII post-closure care plans are proposed. The first type of modification pertains to the scheduling of biennial reports. The second type of modification addresses groundwater monitoring requirements and modifying the post-closure plans for consistency with the State-approved Regional Groundwater Management Area (GMA) plans. The rationale behind both of these modifications is discussed in the following paragraphs, while Table 1 below provides a detailed summary of changes within each Attachment. In addition to these modifications, the Dugway environmental contact for non-compliance issues is being revised to reflect a general contact and contact phone number, in order to allow flexibility in personnel.

Biennial Reports

Currently, the post-closure plans (Attachments VII-2 through VII-23 to Module VII) include schedules for biennial reports. The reporting year for the biennial report is based upon when the post-closure plan was submitted as part of the permit. Thus, some of the sites have even numbered reporting years while others have odd numbered reporting years. In order to simplify submittal of the biennial reports to the State and to have better controls for site inspections, Dugway has proposed to modify the post-closure plans so that each site has an even numbered reporting year, and a unified biennial report due for all sites beginning in 2008. In order to bring all sites into compliance with this proposed schedule, the biennial report submitted by March 1, 2008 will include inspections and address all post-closure care sites currently listed in Module VII regardless of whether the site has an even or odd reporting year. All of the post-closure plans that currently list even reporting years are being modified to indicate odd reporting years. In addition, we proposed that all new sites added to Module VII will fall under this same reporting schedule.

Groundwater Monitoring

In order to streamline groundwater monitoring associated with past disposal practices at Dugway, four regional areas were identified based upon hydrostatigraphic control on contaminant migration and each of these four areas has been designated as a separate GMA. These State-approved GMAs replace the groundwater monitoring standards identified in Utah Administrative Code (UAC) R315-7-13 with alternate groundwater monitoring requirements and also supersede previously defined groundwater monitoring plans contained within individual post-closure plans. The GMAs are incorporated by reference in the Dugway Resource Conservation and Recovery Act (RCRA) part B permit, and as such are permitted documents.

There are two post-closure plans for Hazardous Waste Management Units (HWMUs) in Module VII where groundwater monitoring is addressed but not specifically tied to a GMA: HWMU-2 and HWMU-128. Both of these post-closure plans were developed prior to approval of the appropriate GMA. The post-closure plan for HWMU-2 currently outlines groundwater monitoring. However, as noted in Section 2.3.1.1 of the Downrange GMA, groundwater monitoring at HWMU 2 was determined to not be necessary due to the fact that the source

material (soil) has been removed and that the site met industrial risk-based closure. Therefore, the HWMU-2 post-closure plan is being modified to remove all groundwater monitoring requirements.

HWMU-128 is included in the English Village GMA. The post-closure plan for HWMU-128 is being modified to remove groundwater monitoring requirements and to insert references to the English Village GMA.

Table 1. Summary of Modifications, March 2008

Document	Title	Proposed Changes
Attachment 1-7	CHWSF Contingency Plan	Updated Contact information in Section 2.0
Attachment 1-7	Igloo G Contingency Plan	Updated Contact information in Section 2.0
Attachment 1-7	DTTF Contingency Plan	Updated Contact information in Section 2.0
Attachment VII-2	HWMU-7 Post-Closure Plan	<ul style="list-style-type: none"> Section 7.3: Changed point of contact to a general contact and phone number. Section 7.6: Added text indicating that after the first period of reporting, reporting years shall be change to odd numbered years, with subsequent biennial reports due by March 1st of even numbered years, beginning in 2008. Table 7.2: Modified text to indicate that reporting years are even numbered years beginning with 2006 and odd numbered years beginning 2007 for the duration of the Post-Closure Monitoring Period.
Attachment VII-3	HWMU-2 Post Closure Plan	<ul style="list-style-type: none"> Global format modifications for consistency with proposed changes. Includes general editing, updating of the Table of Contents, re-number of sections, and space corrections. Section 1.0: Removal of all text associated with requirements for groundwater monitoring and analytical requirements associated with groundwater sampling. Table 1-1: Removal of groundwater monitoring requirements, and insertion of the statements that "no additional post-closure groundwater monitoring is required at

Document	Title	Proposed Changes
		<p>HWMU-2 (see Section 2.3.1.1 of the Downrange GMA)." References to Sections 6 and 7 were removed, as these sections are no longer applicable in the plan.</p> <ul style="list-style-type: none"> ▪ Section 2.0: Removal of text referring to groundwater monitoring. ▪ Table 2-1: Correct title to reference HWMU-2. ▪ Section 2.3: removal of reference to the discussion of detection monitoring summary for inorganics and organics provided in Section 2.4. ▪ Section 2.4: Deletion of the discussion of inorganic and organic detection monitoring summaries, as groundwater monitoring is not required fro HWMU-2. This information may be found in the documents referenced in Table 2-1. ▪ Table 2-1: Inclusion of reference for Downrange GMA. ▪ Section 2.4.1, bullet 4 (Formerly Section 2.5.1): Addition of text indicating that HWMU-2 is exempt from the requirement for groundwater monitoring per the Downrange GMA. ▪ Section 6.0: Deletion of entire section, as groundwater sampling is not required for HWMU-2. ▪ Section 7.0: Deletion of entire section, as groundwater sampling is not applicable to HWMU-2. ▪ Section 6.1.2 (Formerly Section 8.1.2): Added text to clarify location of vegetative survey data in Module VII Form C. Appendix A was removed as part of the February 2008 modifications. ▪ Table 6-2 (Formerly Table 8-2): Removal of groundwater monitoring system inspection schedule. ▪ Table 6-3 (Formerly Table 8-3): Removal of requirement for annual groundwater report. ▪ Section 6.1.5: Changed point of contact to a general contact and phone number. ▪ Section 6.3: Removal of groundwater report schedules and requirements.

Document	Title	Proposed Changes
		<ul style="list-style-type: none"> Section 8.3.2: Deletion of entire section, as groundwater monitoring is no longer required for HWMU-2. References: Added reference for Downrange GMA.
Attachment VII-4	HWMU-33 Post-Closure Plan	<ul style="list-style-type: none"> Section 8.2: Added text indicating that after the first period of reporting, reporting years shall be change to odd numbered years, with subsequent biennial reports due by March 1st of even numbered years, beginning in 2008. Table 7.2: Changed table number to Table 8.1 for consistency with the Section. Section 7.3: Changed point of contact to a general contact and phone number. Table 8.1 (former Table 7.2): Modified text to indicate that reporting years are even numbered years beginning with 2006 and odd numbered years beginning 2007 for the duration of the Post-Closure Monitoring Period.
Attachment VII-5	HWMU-124 Post-Closure Plan	<ul style="list-style-type: none"> Section 7.3: Changed point of contact to a general contact and phone number. Section 8.3: Added text indicating that after the first period of reporting, reporting years shall be change to odd numbered years, with subsequent biennial reports due by March 1st of even numbered years, beginning in 2008. Table 8.1 (Formerly Table 7-2): Modified text to indicate that reporting years are even numbered years beginning with 2006 and odd numbered years beginning 2007 for the duration of the Post-Closure Monitoring Period. Re-numbered table for consistency with Section number.
Attachment VII-6	HWMU-128 Post-Closure Plan	<ul style="list-style-type: none"> Table of Contents: Removal of Tables 8-1 and 8-2 and renaming Table 8-3 (to 8-1). Table 1-1: Insertion of text indicating that post-closure groundwater monitoring at HWMU-128 will be in compliance with the English Village Groundwater Management Plan. Section 7.3: Changed point of contact to a

Document	Title	Proposed Changes
		<p>general contact and phone number.</p> <ul style="list-style-type: none"> Section 8.1: Removal of discussion of groundwater monitoring and analyte lists and insertion of reference to the English Village GMA. Tables 8-1 and 8-2: Deleted tables as this information is included in the English Village GMA. Text was modified to reference the GMA. Section 8.3: Added text indicating that after the first period of reporting, reporting years shall be change to odd numbered years, with subsequent biennial reports due by March 1st of even numbered years, beginning in 2008. Table 8.1 (Formerly Table 8-3): Modified text to indicate that reporting years are even numbered years beginning with 2006 and odd numbered years beginning 2007 for the duration of the Post-Closure Monitoring Period. References: Added reference for English Village GMA.
Attachment VII-7	HWMU-36 Post-Closure Plan	<ul style="list-style-type: none"> Section 7.4: Changed point of contact to a general contact and phone number.
Attachment VII-8	HWMU-38 Post-Closure Plan	<ul style="list-style-type: none"> Section 7.4: Changed point of contact to a general contact and phone number.
Attachment VII-9	HWMU-47 Post-Closure Plan	<ul style="list-style-type: none"> Section 7.3: Changed point of contact to a general contact and phone number.
Attachment VII-10	HWMU-63-2 Post-Closure Plan	<ul style="list-style-type: none"> Section 7.4: Changed point of contact to a general contact and phone number.
Attachment VII-11	HWMU-169 Post-Closure Plan	<ul style="list-style-type: none"> Section 7.3: Changed point of contact to a general contact and phone number.
Attachment VII-12	SWMU-21 Post-Closure Plan	<ul style="list-style-type: none"> Section 4.4: Changed point of contact to a general contact and phone number.
Attachment VII-13	HWMU-37 Post-Closure Plan	<ul style="list-style-type: none"> Section 6.4: Changed point of contact to a general contact and phone number. Section 7.2: Added text indicating that after the first period of reporting, reporting years

Document	Title	Proposed Changes
		<p>shall be change to odd numbered years, with subsequent biennial reports due by March 1st of even numbered years, beginning in 2008.</p> <ul style="list-style-type: none"> Table 3: Modified text to indicate that reporting years are even numbered years beginning with 2006 and odd numbered years beginning 2007 for the duration of the Post-Closure Monitoring Period.
Attachment VII-14	HWMU-43 Post-Closure Plan	<ul style="list-style-type: none"> Section 6.5: Changed point of contact to a general contact and phone number. Section 7.2: Added text indicating that after the first period of reporting, reporting years shall be change to odd numbered years, with subsequent biennial reports due by March 1st of even numbered years, beginning in 2008. Table 7: Modified text to indicate that reporting years are even numbered years beginning with 2006 and odd numbered years beginning 2007 for the duration of the Post-Closure Monitoring Period.
Attachment VII-15	HWMU-90 Post-Closure Plan	<ul style="list-style-type: none"> Section 4.4: Changed point of contact to a general contact and phone number. Section 5.2: Added text indicating that after the first period of reporting, reporting years shall be change to odd numbered years, with subsequent biennial reports due by March 1st of even numbered years, beginning in 2008. Table 5-3: Modified text to indicate that reporting years are even numbered years beginning with 2006 and odd numbered years beginning 2007 for the duration of the Post-Closure Monitoring Period.
Attachment VII-16	HWMU-163 Post-Closure Plan	<ul style="list-style-type: none"> Section 7.3: Changed point of contact to a general contact and phone number. Section 8.2: Added text indicating that after the first period of reporting, reporting years shall be change to odd numbered years, with subsequent biennial reports due by March 1st of even numbered years, beginning in 2008. Table 4: Modified text to indicate that reporting years are even numbered years beginning with 2006 and odd numbered years

Document	Title	Proposed Changes
		beginning 2007 for the duration of the Post-Closure Monitoring Period.
Attachment VII-17	SWMU-56 Post-Closure Plan	<ul style="list-style-type: none"> Section 4.4: Changed point of contact to a general contact and phone number.
Attachment VII-18	SWMU-194 Post-Closure Plan	<ul style="list-style-type: none"> Section 4.4: Changed point of contact to a general contact and phone number.
Attachment VII-19	SWMU-207 Post-Closure Plan	<ul style="list-style-type: none"> Section 4.4: Changed point of contact to a general contact and phone number.
Attachment VII-20	SWMU-213 Post-Closure Plan	<ul style="list-style-type: none"> Section 4.4: Changed point of contact to a general contact and phone number.
Attachment VII-21	SWMU-215 Post-Closure Plan	<ul style="list-style-type: none"> Section 4.4: Changed point of contact to a general contact and phone number.
Attachment VII-22	SWMU-200 Post-Closure Plan	<ul style="list-style-type: none"> Section 4.4: Changed point of contact to a general contact and phone number.
Attachment VII-23	SWMU-54 Post-Closure Plan	<ul style="list-style-type: none"> Section 4.4: Changed point of contact to a general contact and phone number.

DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, DUGWAY PROVING GROUND
DUGWAY, UTAH 84022-5000

March 11, 2008



REPLY TO
ATTENTION OF:

Directorate of Environmental Programs

Dennis R. Downs
Director
Division of Solid and Hazardous Waste
Utah Department of Environmental Quality
P.O. Box 144880
Salt Lake City, Utah 84114-4880

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MAR 11 2008

UTAH DIVISION OF
SOLID & HAZARDOUS WASTE
08.00990

Dear Mr. Downs:

On behalf of U.S. Army Dugway Proving Ground (DPG), I am pleased to submit Class 2 Modifications to the Resource Conservation and Recovery Act (RCRA) Operating Permit # UT3750211259, September 2005. This proposed modification includes;

1. Updating the Alternate Environmental Coordinator provided in the facility contingency plans due a recent change in personnel (Attachment 7 to Modules I, II, and V).
2. Removal of groundwater sampling requirements from the post-closure plans located within Attachments 3 (HWMU 2) and 6 (HWMU 128) of Module VII then inserting a reference to the appropriate, recently approved Groundwater Management Area plans.
3. Simplifying the biennial reporting periods provided within the post-closure plans of the Attachments to Module VII to odd years only. Currently some reports are for even and some for odd years.
4. Updating the Environmental Programs Contact for all post-closure plans (Attachment 2 – 23) within Module VII to a staff position contact and general phone number.

Please note that with the sole exception of the Contingency Plan to Module V, the attachments included in this proposed modification are also currently in a 60-day public comment period for a previous modification proposed February 12, 2008. These proposed modifications are submitted under the presumption that the previous modification is accepted. Also note that pending the resolution of ongoing discussions relating to this modification and/or the preceding permit modification we anticipate the submittal of revisions during the public comment period.

Transmittal of the Class 2 Permit Modification. March 11, 2008.

EP-063-08

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

Please direct your staff to contact John Bate of my staff at (435)831-3591 with any questions or comment regarding this submittal.

Sincerely,

A handwritten signature in black ink that reads "Joseph R. Gearo, Jr." The signature is written in a cursive style with a large, stylized "J" and "G".

Joseph R. Gearo, Jr.

Director

Directorate of Environmental Programs

Enclosure



DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY DUGWAY PROVING GROUND
DUGWAY, UTAH 84022-5000

HAND DELIVERED

March 11, 2008

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**UTAH DIVISION OF
SOLID & HAZARDOUS WASTE**
08-00990

PUBLIC NOTICE

Dugway Proving Ground is requesting a Class 2 Modification to its current RCRA Part B Permit. Proposed modifications to the RCRA Part B Permit include: updating the Alternate Environmental Coordinator provided in the facility contingency plans due a recent change in personnel (Attachment 7 to Modules I, II, and V); revising the point of contact in all Module VII Attachments, revising post-closure plans located within Attachments 3 (HWMU 2) and 6 (HWMU 128) of Module VII to remove groundwater sampling details and inserting references the appropriate Groundwater Management Area plans where groundwater monitoring details are provided; and simplifying the biennial reporting periods so that all sites have the same reporting years.

Please note that with the sole exception of the Contingency Plan to Module V, the attachments included in this proposed modification are also currently in a 60-day public comment period for a previous modification proposed February 12, 2008.

In an effort to assist the public in making informed comments, Dugway Proving Ground is hosting a Public Meeting on April 22, 2008 at 7:30 p.m. in the Tooele County Courthouse, located at 47 South Main Street, Tooele, Utah. There will be a 60-day public comment period beginning March 11, 2008 and ending May 10, 2008. Interested parties can send comments and queries to: Mr. Dennis Downs, Utah Division of Solid and Hazardous Waste, 288 North 1460 West, Salt Lake City, UT 84114-4800, (801) 538-6170. Copies of the permit and related documents will be available for public review during the comment period at the following locations:

- Utah Division of Solid and Hazardous Waste, 288 North 1460 West, P.O. Box 144880, Salt Lake City, Utah 84114-4880, (801) 538-6170
- Tooele City Public Library, 128 West Vine Street, Tooele, Utah, (435) 882-2182
- Dugway Technical Library, 5124 Kister Avenue, Dugway Utah, 84022, (435) 831-2178